

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

THERESA D. BURNETT

Plaintiff,

v.

**Tax Ease Funding, L.P.,
Greg Leal, (In Rem Only), and
Citifinancial, Inc. (In Rem Only)**

Defendants

§
§
§
§
§
§
§
§
§
§
§

CIVIL ACTION No. 4:11-cv-01189

DEFENDANT TAX EASE FUNDING, L.P.'S DESIGNATION OF EXPERT WITNESSES

Defendant Tax Ease Funding, L.P., makes this its designation of expert witnesses pursuant to Rule 26(a)(2)(B) Fed. R. Civ. P., and the Court's Scheduling Order dated May 16, 2011, as follows:

Defendant may call to testify the following experts:

1. Howard Marc Spector
Spector & Johnson, PLLC
12770 Coit Road, Suite 1100
Dallas, TX 75251
(214) 365-5377

Mr. Spector is an attorney retained by Defendant. Mr. Spector is an attorney licensed to practice in the State of Texas. Biographical information regarding Mr. Spector is available at his law firm web site, www.spectorjohnson.com. Mr. Spector may testify regarding the reasonableness and necessity of attorney's fees sought by Plaintiff in this case.

2. Susan Watson
Tax Ease Funding, L.P.
14901 Quorum Drive, Suite 900
Dallas, TX 75254
(214) 420-5936

Ms. Watson is an employee of the Defendant, and is thus a non-retained expert. Her duties as Defendant's employee do not regularly involve giving expert testimony. Ms. Watson is expected to testify (i) as to the method of calculation of any amounts required to be disclosed to Plaintiff under the Home Ownership and Equity Protection Act or the Truth-in-Lending Act; (ii) that such disclosures were within the applicable statutory "tolerances for accuracy;" and (iii) the method of calculation of the applicable statutory "tolerances for accuracy."

Experts Designated Later

Defendant may call as testifying expert witnesses any experts designated at a later date by any other party to this lawsuit.

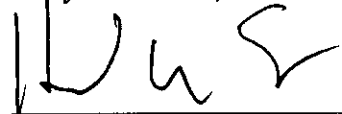
Rebuttal Experts

Defendant reserves the right to designate and offer the testimony of rebuttal expert witnesses.

Dated: October 31, 2011.

Respectfully submitted,

By:



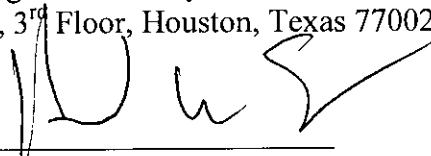
Howard Marc Spector
TBA #00785023
SD#23274

SPECTOR & JOHNSON, PLLC
Banner Place, Suite 1100
12770 Coit Road
Dallas, Texas 75251
(214) 365-5377
FAX: (214) 237-3380
EMAIL: hms7@cornell.edu

ATTORNEY FOR DEFENDANT
TAX EASE FUNDING, L.P.

CERTIFICATE OF SERVICE

The undersigned certifies that on this 31st day of October, 2011, a copy of the foregoing document was served upon the Plaintiff, by and through her attorney of record, Richard Tomlinson, Lone Star Legal Aid, 1415 Fannin Street, 3rd Floor, Houston, Texas 77002, via facsimile (713) 652-3814.


Howard Marc Spector